

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Superior Barrel and Drum - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #9**
Commence Document Review
Superior Barrel and Drum

Elk, NJ
Latitude: 39.6930670 Longitude: -75.1345550

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From: Keith Glenn, OSC/Environmental Scientist

Date: 11/3/2013

Reporting Period: October 28, 2013 through November 3, 2013

1. Introduction

1.1 Background

Site Number:	A23K	Contract Number:	EP-S2-10-01
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/30/2013	Start Date:	9/27/2013
Demob Date:		Completion Date:	
CERCLIS ID:	NJD986630705	RCRIS ID:	
ERNS No.:		State Notification:	8/29/2013
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

1.1.2 Site Description

On August 29, 2013 the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Observed were thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5-acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the south are private lands which are also densely wooded with several marshy areas. The western boundary is State Route 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with

several trailers holding containers. This area encompasses approximately .32 acres of land. Both areas show signs of impact from leaking containers or dumping of materials.

1.1.2.2 Description of Threat

The facility is located in a federally recognized wetland. Thousands of containers are in various conditions of deterioration and leaking containers have been noted. Many labels on containers indicate contents of hazardous substances, however the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shot-gun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots were collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead, and many other hazardous substances make up the contents of the containers. Soil samples also showed attribution between the materials in the containers and that in the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Activities at the Superior Barrel and Drum Site continued with field crews focused on collecting container samples. Most of the containers in Area 3 have been sampled and managers are looking into tactics for removing containers stored in on-Site trailers. Changes in personnel have expedited the field analysis of samples and progress has been made in processing the backlog of aliquots.

The file review and copy project commenced this operational period with personnel reviewing and scanning all documents located on-Site. These files will be utilized for enforcement purposes.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife, and local officials. NJDEP personnel visit the Site on a weekly basis and communication with Elk Township officials also continued. Security personnel are available from 1700 hours – 0830 hours during operating days. Twenty-four security is provided during weekends and holidays.

2.1.2 Response Actions to Date

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

From October 28, 2013 through November 3, 2013 on-Site personnel continued collection of materials from containers located in Area 3. Contents from stacked 275-gallon totes were transferred to 55-gallon drums in order to safely move the containers for inspecting and sampling. To aid in the sampling efforts, containers were moved to Area 6 so remaining drums and totes could be sampled safely.

Several containers have been identified as high-hazard through the field screening process. This includes water reactive, oxidizer, and highly corrosive materials. Personnel commenced with the over-packing of these containers and segregation from other containers. Site managers started outlining

the areas for consolidating containers of similar characteristics. This will aid in the future bulking of materials prior to disposal.

RST personnel continued to deploy and monitor perimeter air monitoring units. RST continued working with field sampling crews to maintain integrity of logs associated with container identification and field analysis results. RST also started inputting field data into Response Manager. This program will hold information regarding each container, including any labels, identifying markers, original location, and photos of the container condition.

A reporter and photographer from the South Jersey Times visited the Site on November 1, 2013. OSCs gave a tour of operations as visible from Jacob Harris Lane. Questions were answered, interviews were given, and photographs of crew members working were taken. The EPA Press Officer was on-scene to facilitate the visit. Members of Elk Township and Gloucester County were invited to attend, but were not able to make it.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. A 104(e) letter was also drafted for Incineration Recycling Services of Camden. ORC and the Enforcement Section continue to discuss additional options for obtaining information from Mr. Toy.

RST personnel commenced performing an extensive review of all documents found on-Site. Documents were found in Trailers 3 and 11. Many of the documents were found to be moldy and covered in animal feces. All documents were repackaged and brought to Trailer 1. A documentation processing area was constructed to inspect, review, scan, and categorize all papers meeting previously established criteria.

During the inventorying of containers, numerous totes were found with other company names. These totes had non-hazardous labels and indicated the contents to be residual waste. Companies listed include Container Recyclers of Camden, SRS Bro LLC of Camden, IRS Inc of Camden, Jefferson Property Partners of Camden, Fogel & Sons, and others. All of these facilities appear to be related. IRS, Container Recyclers of Camden, and SRSBRO are the same company located on Jefferson Street in Camden. The principle president and listed managers are members of the Fogel family. It should be noted that IRS also has a facility in Texas that is operated by Thomas Toy, Jr. Additional drum labels include Valspar, Mahogany Co., Grimmway Farms, BASF, Silmar, foreign countries and more.

2.1.4 Progress Metrics

	Number of Aliquots for HazCat Collected ¹	Number of Confirmatory Samples*	Number of Surface Soil Samples*	Number of Surface Water Samples*
Cumulative Total	1491	79	36	4

¹Several containers were opened but aliquot and sample collection was not possible. This count does not include those containers.*Does not include duplicate samples or MS/MSDs for QA/QC.

Haz Class	Acid	Neutral	Potential	Flammable	Oxidizer	Base	Chlorinated	HazCat
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			Oil					Complete
Cumulative Total	48	656	175	261	31	62	4	1205

The following table will be completed once transport and disposal operations begin.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

Several containers were opened but aliquot and sample collection was not possible. This count does not include those containers.*Does not include duplicate samples or MS/MSDs for QA/QC. The following table will be completed once transport and disposal operations begin.

2.2 Planning Section

2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities of the Superior Barrel and Drum Site. During the next operational period, routine activities will continue. ERRS will continue to move and manage containers located on-Site. Personnel, utilizing Level B PPE, will continue to assess containers and collect aliquots of materials for field testing. RST personnel will continue to manage perimeter air monitoring equipment.

2.2.1.1 Planned Response Activities

During the next operational period sampling crews will complete the collection of samples from all containers located in Area 3. This does not include those located in trailers. Trailers 2, 5, 6, 7, 10, and 11 are currently holding containers. Equipment will be received in the next week to access and remove the containers located in these trailers. Many of these trailers have been damaged due to prolonged exposure to weather elements and the contents of leaking drums. Once containers are removed from the trailer, a sampling team will inspect, document, and sample the materials.

Dye tests will be performed on a floor drain that was previously identified in the building. It is thought the drain leads to underground piping that releases to the wetlands

Utilizing the report generated from a structural engineer, the on-Site structure will be modified to handle containers prior to transport. Site managers are discussing the options for creating warming cells where personnel may be able to prepare containers for final disposal. Areas in the building may be modified to aid in bulking of materials during cold weather events. Protected laboratory space is also being reviewed.

As short term goals are accomplished, operations will move into consolidating materials, waste removal, container destruction, inspection of potentially buried USTs and drums, and performance of additional soil investigations.

2.2.2 Issues

No issues to report at this time.

2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, RST personnel or ERRS personnel.

2.4 Finance Section

2.4.1 Narrative

On September 4, 2013, \$250,000 has been given to the Kemron ERRS contract to perform an emergency removal assessment.

On September 27, 2013, \$600,000 was verbally authorized for the commencement of a Removal Action. The Action Memorandum is being drafted.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Assessment	\$250,000.00	\$205,260.00	\$44,740.00	17.90%
ERRS - Removal Action	\$600,000.00	\$123,098.00	\$476,902.00	79.48%
TAT/START - RV	\$0.00	\$53,126.00	(\$53,126.00)	0.00%
START - RA (Includ CLP)	\$0.00	\$148,595.00	(\$148,595.00)	0.00%
Intramural Costs				
Total Site Costs	\$850,000.00	\$530,079.00	\$319,921.00	37.64%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted.

2.5.2 Liaison Officer

The OSC is acting Liaison Officer with local, State, and County officials.

2.5.3 Information Officer

Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos is the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

A Community Update was approved by PAD on October 23, 2013.

3. Participating Entities

3.1 Unified Command

Unified Command is currently not being used.

3.2 Cooperating Agencies

EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

- NJDEP
- Gloucester County HazMat Team and Department of Emergency Response
- Gloucester County Fire Marshal and Fire Department
- Police Department
- Glassboro Water Department
- Elk Township

4. Personnel On Site

EPA (2)

RST Contractors - Weston Solutions (3)

ERRS Contractors - Kemron (12)

5. Definition of Terms

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

CERCLA - Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. Section 9601).

E Goods - Electronic machines which contain hazardous components.

Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

EPA - United States Environmental Protection Agency

ERRS - Emergency and Rapid Response Services contract.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

FWS or U.S. FWS - United States Fish and Wildlife Service.

HazCat - Hazardous Categorization, a field technique which utilizes a series of chemical tests on samples collected in the field (aliquots) to determine the characteristics of hazardous and non-hazardous substances. The characteristics which can be determined include matrix (material state), solubility, combustibility, flammability, pH and the presence of oxidizers, peroxides, sulfides, PCB, cyanide.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Monitoring - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

NELAC - National Environmental Laboratory Accreditation Conference.

NJDEP - New Jersey Department of Environmental Protection.

OSC - Federal On-Scene Coordinator.

OSHA - Occupational Safety and Health Administration.

PCBs - Polychlorinated biphenyls, a class of chemical compounds.

PPE - Personal protective equipment.

PRP - Potentially Responsible Party.

RCRA - Resource Conservation and Recovery Act.

REOC - EPA Region II Regional Emergency Operations Center.

RMP - Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

RST - Removal Support Team contract.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

TCE - Trichloroethylene.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosoc.org/SuperiorBarrelAndDrum

6.2 Reporting Schedule

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates will no longer be provided.

7. Situational Reference Materials

